

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO

IN RE:

CASE NO. 18-60311

DEBORAH KAY BULGRIN

CHAPTER 13

Debtor

JUDGE RUSS KENDIG

SUPPLEMENTAL TO MOTION

Comes now Deborah Bulgrin, Debtor herein, and supplements the previous Motion filed on July 2, 2019, Docket No. 35, as follows:

1. The prior Motion's restated and incorporated herein.
2. The Debtor has made all post-petition payments.
3. The creditor filed a Notice of Mortgage Payment change on July 11, 2019.
4. The escrow payment of \$335.05 per month yields a total of \$4,020.60.
5. The projected disbursements per year are \$3,943.06, less than what is being paid.
6. Any shortage is the result of internal bookkeeping errors by claimant, and not

from a deficiency in escrow payments by the Debtor into the Plan.

WHEREFORE, the Debtor requests that the Court sustain this Objection, and leave the post-petition payment untouched, and that the Motion of the Debtor filed on July 2, 2019 and Docket No. 35, be granted.

/s/ Edwin H. Breyfogle  
Edwin H. Breyfogle  
Ohio Reg. No. 0000822  
Attorney for Debtor  
108 Third St NE  
Massillon, OH 44646  
(330) 837-9735  
FAX (330) 837-8922  
Email: [edwinbreyfogle@gmail.com](mailto:edwinbreyfogle@gmail.com)

CERTIFICATE OF SERVICE

The undersigned certifies that on 25th day of July, 2019, a true and correct copy of the foregoing Objection was served via the Court's electronic case filing system on the following who are listed on the Court's Electronic Mail Notice List:

\_\_\_\_\_ \*Dynele L. Schinker-Kuharich

[dlsk@chapter13canton.com](mailto:dlsk@chapter13canton.com)

\*Raymond Valderrama

[prpbk@bsifinancial.com](mailto:prpbk@bsifinancial.com)

A copy of the foregoing was sent by ordinary US mail on this 25th day of July, 2019 to the following:

1. US Bank Trust National Association as Trustee  
c/o BSI Financial Services  
1425 Greenway Dr, Suite 400  
Irving, TX 75038
2. Michelle R. Ghidotti-Gonsalves  
Attorney at Law  
1920 Old Tustin Ave  
Santa Ana, CA 92705

/s/ Edwin H. Breyfogle  
Edwin H. Breyfogle  
Attorney for Debtor

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**NOTICE OF OBJECTION**

Deborah Kay Bulgrin has filed papers objecting to post-petition mortgage payment.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to approve this Motion, or if you want the Court to consider your views on the Motion, then on or before **August 16, 2019** you or your attorney must file an objection with the Clerk, United States Bankruptcy Court, Ralph Regula Federal Building, 401 McKinley Ave, SW, Canton, OH 44702.

If you mail your objection to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also send a copy to:

Edwin H. Breyfogle, Attorney for Debtor, 108 Third St NE, Massillon, OH 44646

You must also attend the hearing scheduled to be held on **August 21, 2019 at 2:00 p.m.** in the United States Bankruptcy Court, Ralph Regula Federal Building, 401 McKinley Ave SW, Canton, OH 44702.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: 7/25/19

/S/ Edwin H. Breyfogle  
Edwin H. Breyfogle  
Ohio Reg. No. 0000822  
Attorney for Debtor  
108 Third St NE  
Massillon, OH 44646  
(330) 837-9735